

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION**

<b>KRISTEN DEITER,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>JURY DEMAND</b>
	)	
<b>v.</b>	)	<b>No: 2:22-cv-00030</b>
	)	
<b>TENNESSEE TECHNOLOGICAL UNIVERSITY,</b>	)	<b>Chief Judge Waverly D. Crenshaw, Jr.</b>
	)	<b>Magistrate Judge Alistair E. Newbern</b>
	)	
<b>Defendant.</b>	)	

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**DEFENDANT TENNESSEE TECHNOLOGICAL UNIVERSITY'S  
MOTION FOR LIMITED DISCOVERY REGARDING PLAINTIFF'S  
ATTORNEY FEE MOTION AND FOR A BRIEFING SCHEDULE  
TO RESPOND TO PLAINTIFF'S MOTION OR IN THE ALTERNATIVE FOR AN  
EXTENSION OF TIME TO FILE A RESPONSE TO PLAINTIFF'S MOTION**

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Defendant, Tennessee Technological University (TTU) moves this Court to enter a briefing schedule that will allow Defendant to conduct limited discovery and respond to Plaintiff's attorney fee motion. In support of its request, Defendant submits that it is unable to adequately respond to Plaintiff's attorney fee request without additional information regarding, in part, Plaintiff's actual fee rates and/or payments to date related to this case as well as the current relationship of the attorneys who have worked on this case and for whom attorney time is being claimed. Defendant does not anticipate the necessary discovery taking more than 60 days to complete and suggests the time may be less. Without this basic information, Defendant will be prejudiced in responding to Plaintiff's attorney fee motion because these are necessary details to determine the reasonableness Plaintiff's argument.

Defendant has contacted Plaintiff's counsel to determine Plaintiff's position on its request for limited discovery and a corresponding briefing extension and counsel has advised that Plaintiff does oppose Defendant's request.

As more fully set forth in the accompanying memorandum, Defendant moves this Court to set a briefing schedule to allow limited discovery in this matter to avoid prejudice to Defendant as well as to allow Defendant time to respond to Plaintiff's attorney fee motion after discovery has been completed, or, in the alternative to extend the time for Defendant to file a responsive memorandum by fourteen days.<sup>1</sup>

Respectfully Submitted,

**JONATHAN SKRMETTI**  
**Attorney General and Reporter**

s/ E. Ashley Carter

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<sup>1</sup> Defendant's current deadline to file a response is March 20, 2025. Defendant seeks an additional fourteen days to file its response if this Court denies its discovery and corresponding briefing schedule.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 18, 2025, a copy of the foregoing **Motion for Limited Discovery and a Briefing Schedule, or an Extension to Respond** was served by email upon Plaintiff's counsel as follows:

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s/E. Ashley Carter

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